

From: [William Erickson](#)  
To: [Dan Peacock](#)  
Cc: [Bill Jacobs](#); [John Hebert](#); [Laura Parsons](#); [Russell Wasem](#)  
Subject: Re: Fw: Living Bird mag: rat poison killing birds of prey  
Date: 01/31/2012 01:56 PM

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As Dan notes, the Agency has long realized the potential for brodifacoum to poison nontarget wildlife based on field studies that killed owls and other nontargets. Thus, field uses were never allowed due to these documented risks. Just prior to the RED being issued in July, 1998 we became aware the NY State Dept. Conservation had detected brodifacoum in numerous raptors and nontarget mammals, apparently resulting from registered uses "in and around" buildings. The RED team agreed these incidents warranted additional attention by the Agency. SRRD would not delay issuing the RED but did add the following statement to the RED:

"The Agency recently became aware of incident data which suggests that there may be a potential incident problem specifically involving the active ingredient brodifacoum. At this time the Agency is reviewing the data; no final conclusions have been reached. Additionally, through the "Notice of Availability" for this document, the Agency requests state incident data on all rodenticides to better understand the extent of this potential problem. After review, the Agency may impose additional restrictions on the use of brodifacoum."

This led to EFED preparing a comparative risk assessment for nine rodenticides, which include a listing of all reported incidents. The document was finalized in July, 2004, after addressing comments and concerns from industry, environmental groups, other federal agencies, and other stakeholders. Mitigation discussions followed and I believe the final mitigation decision was issued in 2008.

-----Dan Peacock/DC/USEPA/US wrote: -----

To: Russell Wasem/DC/USEPA/US@EPA  
From: Dan Peacock/DC/USEPA/US  
Date: 01/31/2012 09:32AM  
Cc: Bill Jacobs/DC/USEPA/US@EPA, Laura Parsons/DC/USEPA/US@EPA, William Erickson/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA  
Subject: Re: Fw: Living Bird mag: rat poison killing birds of prey

Rus,

Bill Erickson, now in BPPD, would be the best person historically to answer the question.

We have always required tamper-resistant bait stations if rodenticides were to be used in areas accessible to wildlife, but people were not using them or were not using them properly.

In 1980, when we initially registered Brodifacoum, we knew that it was highly toxic, based on lab tests. For that reason, initially, we did not allow its use "in and around agricultural buildings". After a barn owl study in NJ, we allowed its use "in and around agricultural buildings".

We thought that confining its use to "in and around buildings" would be sufficient to avoid major wildlife exposure.

After registration, experimental trials in VA apple orchards showed its long half life and its ability to kill significantly large numbers of kestrels (raptors) secondarily. We asked for more data, and the co dropped development of this use.

As I recall, in 1995, EFED began receiving the initial spike in Brodifacoum incidents. By then labs had started looking for this active systematically.

After the issuance of the 1998 RED, the Agency held a 1 day meeting on nontarget wildlife incidents.

Bill Jacobs can provide more detail on this meeting. You can also check his Rodenticide History paper that Bill prepared for the SAP meeting.

Let me know if you have additional questions.

Daniel B. Peacock, Biologist  
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Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

 Russell Wasem---01/31/2012 08:39:08 AM---Good Morning Bill, Dan, I am responding to a rodenticide press inquiry that asks about some history.

From: Russell Wasem/DC/USEPA/US  
To: Dan Peacock/DC/USEPA/US@EPA, Bill Jacobs/DC/USEPA/US@EPA  
Cc: Laura Parsons/DC/USEPA/US@EPA  
Date: 01/31/2012 08:39 AM  
Subject: Fw: Living Bird mag: rat poison killing birds of prey

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Good Morning Bill, Dan,

I am responding to a rodenticide press inquiry that asks about some history. Can you all let me know what you think about these two questions?

- How long has EPA been aware of wildlife deaths from the second-generation anticoagulants (like brodifacoum, and others)? (Are there specific docs like PR notice earlier than the 98 RED that discuss this?)
- When did the agency move to try to reduce their impact?

Thank you in advance for any input you can provide on this.

Rusty\_\_\_\_\_

----- Forwarded by Russell Wasem/DC/USEPA/US on 01/31/2012 08:36 AM -----

From: Neil Anderson/DC/USEPA/US  
To: Russell Wasem/DC/USEPA/US@EPA, Laura Parsons/DC/USEPA/US@EPA  
Date: 01/30/2012 03:11 PM  
Subject: Fw: Living Bird mag: rat poison killing birds of prey

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more press inquiries - Carol is out today and we don't know when the interview may be scheduled, but maybe we can get a headstart on these Q's in the next day or so.  
Thanks.

Neil Anderson  
Chief, Risk Management and Implementation Branch 1 (RMIB1)  
Pesticide Re-evaluation Division (7508P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
ph: (703)308-8187

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----- Forwarded by Neil Anderson/DC/USEPA/US on 01/30/2012 03:10 PM -----

From: Richard Keigwin/DC/USEPA/US  
To: "Neil Anderson" <Anderson.Neil@epamail.epa.gov>, "Carol Stangel" <Stangel.Carol@epamail.epa.gov>  
Date: 01/30/2012 02:29 PM  
Subject: Fw: Living Bird mag: rat poison killing birds of prey

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We'll need to get responses cleared before the interview is scheduled.

Rick Keigwin  
Director, Pesticide Re-evaluation Division  
Office of Pesticide Programs  
US Environmental Protection Agency  
Phone: 703-308-8000  
FAX: 703-308-8005  
<http://www.epa.gov/pesticides>  
\Sent by EPA Wireless E-Mail Services.

 Dale Kemery

----- Original Message -----

**From:** Dale Kemery  
**Sent:** 01/30/2012 02:19 PM EST  
**To:** Claire Gesalman  
**Cc:** Richard Keigwin; parsons.douglas@epa.gov; Chris Gillis; Margie Fehrenbach; Debby Sisco; Karen Angulo  
**Subject:** Living Bird mag: rat poison killing birds of prey  
Cathy Bell is working on an article for Living Bird, the magazine of the Cornell Laboratory of Ornithology. She's angling for an interview with Rick Keigwin. She says, "I'd like to get some quotes about EPA's work so far on getting anticoagulant rodenticides off store shelves." We can't